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Attorneys for Plaintiff Target Corporation

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

This Document Relates to:

*Target Corp. v. Chunghwa Picture Tubes,
Ltd., et al.*, Case No. 3:11-cv-05514-SC

*Target Corp., et al. v. Technicolor SA, et
al.*, Case No. 3:13-cv-05686-SC

Master File No. 3:07-cv-05944-SC

MDL No. 1917

**STIPULATION AND ~~PROPOSED~~
ORDER DISMISSING WITH PREJUDICE
PLAINTIFF'S CLAIMS UNDER STATE
LAW**

Judge: Hon. Samuel Conti

Pursuant to Rule 41(a)(1) of the Federal Rules of Civil Procedure, plaintiff Target Corporation (“Plaintiff”), and defendants Chunghwa Picture Tubes, Ltd., Chunghwa Picture Tubes (Malaysia), Irico Group Corporation, Irico Group Electronics Co., Ltd., Irico Display Devices Co., Ltd., LG Electronics, Inc., LG Electronics USA, Inc., LP Displays International Ltd., Hitachi, Ltd., Hitachi Displays, Ltd., Hitachi America, Ltd., Hitachi Asia, Ltd., Hitachi Electronic Devices (USA), Inc., Panasonic Corporation, Panasonic Corporation of North America, MT Picture Display Co., Ltd., Beijing Matsushita Color CRT Co., Ltd., Koninklijke Philips Electronics N.V., Philips Electronics North America Corporation, Philips Electronics Industries (Taiwan), Ltd., Philips da Amazonia Industria Electronica Ltda., Samsung SDI Co., Ltd., Samsung SDI America, Inc., Samsung SDI Mexico S.A. de C.V., Samsung SDI Brasil Ltda., Shenzhen Samsung SDI Co., Ltd., Tianjin Samsung SDI Co., Ltd., Samsung SDI (Malaysia) Sdn. Bhd., Samtel Color Ltd., Thai CRT Co., Ltd., Toshiba Corporation, Toshiba America, Inc., Toshiba America Consumer Products, LLC, Toshiba America Electronic Components, Inc., Toshiba America Information Systems, Inc., Technicolor SA (f/k/a Thomson SA); Technicolor USA, Inc. (f/k/a Thomson Consumer Electronics, Inc.), Videocon Industries, Ltd., Technologies Displays Americas LLC (f/k/a Thomson Displays Americas LLC), Mitsubishi Electric Corporation, Mitsubishi Electric Visual Solutions America, Inc., and Mitsubishi Electric & Electronics USA, Inc., being all the defendants in this case (collectively, “Defendants”) state as follow:

On October 3, 2013, Target Corporation filed its Second Amended Complaint (“SAC”) in individual case number 3:11-cv-05514-SC (MDL Master Dkt. No. 1981). On December 9, 2013, Target filed its Complaint in individual case number 3:13-cv-05686-SC (Ind. Case Dkt. No. 1) (the “Thomson/Mitsubishi/TDA Complaint”). The SAC and the Thomson/Mitsubishi/TDA Complaint are the “Complaints.” In the Complaints, Target asserts claims for relief against Defendants under the Sherman Act, the California Cartwright Act, California’s Unfair Competition Law, California Business and Professional Code §17200, *et seq.*, Arizona Revised Stat. § 44-1401, *et seq.*, Florida Stat. §501.201, *et seq.*, Illinois Antitrust Act, 740 Illinois Code

10/1, *et seq.*, Iowa Code §§ 553.1, *et. seq.*, Kansas Stat. Ann. §§ 50-101, *et. seq.*, Michigan
 Comp. Laws Ann. §§ 445.771, *et seq.*, Minnesota Stat. §§ 325D.50, *et seq.*, New York General
 Business Law §§ 340, *et seq.*, North Carolina Gen. Stat. §§ 75-1, *et seq.*, and Wisconsin Stat. §§
 133.01, *et seq.*

Plaintiff now desires to dismiss with prejudice its claims against Defendants under the
 California Cartwright Act, California's Unfair Competition Law, California Business and
 Professional Code §17200, *et seq.*, Arizona Revised Stat. § 44-1401, *et seq.*, Florida Stat.
 §501.201, *et seq.*, Illinois Antitrust Act, 740 Illinois Code 10/1, *et seq.*, Iowa Code §§ 553.1, *et.*
seq., Kansas Stat. Ann. §§ 50-101, *et. seq.*, Michigan Comp. Laws Ann. §§ 445.771, *et seq.*,
 Minnesota Stat. §§ 325D.50, *et seq.*, New York General Business Law §§ 340, *et seq.*, North
 Carolina Gen. Stat. §§ 75-1, *et seq.*, and Wisconsin Stat. §§ 133.01, *et seq.* Plaintiff is not
 dismissing, and will continue to prosecute, its claims against Defendants under the Sherman Act.

NOW, THEREFORE, THE PARTIES STIPULATE AND AGREE that the claims of
 Plaintiff asserted against Defendants in these cases under the California Cartwright Act,
 California's Unfair Competition Law, California Business and Professional Code §17200, *et*
seq., Arizona Revised Stat. § 44-1401, *et seq.*, Florida Stat. §501.201, *et seq.*, Illinois Antitrust
 Act, 740 Illinois Code 10/1, *et seq.*, Iowa Code §§ 553.1, *et. seq.*, Kansas Stat. Ann. §§ 50-101,
et. seq., Michigan Comp. Laws Ann. §§ 445.771, *et seq.*, Minnesota Stat. §§ 325D.50, *et seq.*,
 New York General Business Law §§ 340, *et seq.*, North Carolina Gen. Stat. §§ 75-1, *et seq.*, and
 Wisconsin Stat. §§ 133.01, *et seq.* are dismissed with prejudice. Both Plaintiff and Defendants
 agree to bear their own costs and fees with respect to the dismissed claims. This dismissal does
 not apply to the claims of Plaintiff asserted against Defendants in these cases under the Sherman
 Act.

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1 Dated: November 5, 2014

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1 Pursuant to General Order No. 45, § X-B, the filer asserts that concurrence in the filing of
2 this document has been obtained from each of the above signatories.

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4 Dated: November 5, 2014

By: /s/Jason C. Murray
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5 **IT IS SO ORDERED.**

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7 Dated: 11/24/2014

Hon. Sa
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